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*Proposed Attorneys for Debtors
and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)
Chapter 11

(Lead Case)
(Jointly Administered)

**NOTICE OF AGENDA FOR
MARCH 13, 2019 9:30 A.M.
OMNIBUS HEARING**

Date: March 13, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

**PROPOSED AGENDA FOR
MARCH 13, 2019 9:30 A.M. (PACIFIC TIME)
OMNIBUS HEARING**

I. MATTERS SCHEDULED TO BE HEARD IN MAIN CASE: No. 19-30088 (DM)

1. **DIP Financing Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 362, 363, 364, 503 and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004 and 9014 for Interim and Final Orders (I) Authorizing the Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing, (II) Granting Liens and Superpriority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling Final Hearing, and (V) Granting Related Relief [**Dkt. 23**].

Response Deadline: February 20, 2019, except for the Official Committee of Unsecured Creditors and the Official Committee of Tort Claimants, for whom the response deadline was extended by stipulation and order to March 8, 2019 at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Sonoma Clean Power Authority's Statement of Support for Debtors' Motion for Postpetition Financing and Reservation of Rights [**Dkt. 65**].
 - i. Declaration of Geoffrey G. Syphers in Support of Sonoma Clean Power Authority's Statement [**Dkt. 67**].
- B. Statement of Peninsula Clean Energy Authority (A) In Support of Debtors' Motion for Postpetition Financing and (B) Reservation of Rights [**Dkt. 149**].
- C. Preliminary Objection of California State Agencies to DIP Financing Motion [**Dkt. 162**].
- D. Objection of the United States Trustee to Debtors' Motion for Interim and Final Orders Authorizing Debtor in Possession Financing [**Dkt. 168**].
- E. Statement and Reservation of Rights of the California Self-Insurers' Security Fund Regarding the DIP Motion and Entry of the Proposed Interim DIP Order [**Dkt. 172**].
- F. Objection of the Public Entities to Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 362, 363, 364, 503 and 507, and Fed.R. Bankr. P. 2002, 4001, 6003, 6004 and 9014 for Interim and Final Orders (I) Authorizing the Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing, (II) Granting Liens and Superpriority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling Final Hearing and (V) Granting Related Relief [**Dkt. 494**].
- G. Joinder by the SLF Fire Victim Claimants in Objection of the Public Entities to Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 362, 363, 364, 503 and 507, and Fed.R. Bankr. P. 2002, 4001, 6003, 6004 and 9014 for Interim and Final Orders (I) Authorizing the Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing, (II) Granting Liens and Superpriority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling Final Hearing and (V) Granting Related Relief [**Dkt. 519**].

- H. Statement and Reservation of Rights of the California Self-Insurers' Security Fund Regarding the DIP Motion and Entry of the Proposed Final DIP Order [**Dkt. 576**].
- I. Statement and Reservation of Rights of Official Committee of Unsecured Creditors with respect to Certain Matters Scheduled for February 27 Hearing [**Dkt. 610**].
- J. Objection of the Official Committee of Tort Claimants to Debtors' DIP Financing Motion [**Dkt. 800**].
- K. Objection of the SLF Fire Victim Claimants to Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 362, 363, 364, 503, and 507, and Fed. R. Bankr. P. 2002, 4001, 6003, 6004, and 9014 for Interim and Final Orders (I) Authorizing the Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing, (II) Granting Liens and Superpriority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling Final Hearing, and (V) Granting Related Relief [**Dkt. 804**].
- i. Declaration of Gerald Singleton in Support of Objection [**Dkt. 804-1**].
- ii. Request for Judicial Notice in Support of Objection [**Dkt. 804-2**].
- L. Joinder of Individual Butte Fire, North Bay Fires, and Camp Fire Victim Claimants in the Objection by the Official Committee of Tort Claimants to Debtors' DIP Financing Motion [**Dkt. 828**].
- i. Declaration of Dario Ghetaldi, Esq., in Support of Joinder of the Official Committee of Tort Claimants to Debtors' DIP Financing Motion [**Dkt. 828-1**].
- M. Statement of the Official Committee of Unsecured Creditors in Support of the Final Approval of the Debtors' DIP Motion [**Dkt. 835**].
- Related Documents:
- N. Declaration of David Kurtz in Support of Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 362, 363, 364, 503 and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004 and 9014 for Interim and Final Orders (I) Authorizing the Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing, (II) Granting Liens and Superpriority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling Final Hearing, and (V) Granting Related Relief [**Dkt No. 24**].
- O. Notice of Filing of Proposed Final Order Pursuant to 11 U.S.C. §§ 105, 362, 363, 364, 503, and 507 and Fed. R. Bankr. P. 2002, 4001, 6004, and 9014 (I) Authorizing Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing, (II) Granting Liens and Superpriority Claims, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [**Dkt. 709**].
- P. Debtors' Omnibus Reply in Support of Debtors' DIP Financing Motion and in Response to the Objections Thereto [**Dkt. 817**].

Q. Omnibus Reply of the DIP Administrative Agent to the Objections of (I) the Official Committee of Tort Claimants, (II) the Public Entities, and (III) the SLF Fire Victim Claimants to Debtors' Motion Seeking Postpetition Financing [Dkt. 818].

Status: This matter is going forward.

2. **Cash Management Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507 and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to (I)(A) Continue Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related to the Use Thereof, (C) Continue Intercompany Arrangements, (D) Continue to Honor Obligations Related to Joint Infrastructure Projects, and (E) Maintain Existing Bank Accounts and Business Forms; and (II) Waiving the Requirements of 11 U.S.C. § 345(b) [Dkt. 7].

Response Deadline: February 20, 2019, except for the Official Committee of Unsecured Creditors and the Official Committee of Tort Claimants, for whom the response deadline was extended by stipulation and order to March 8, 2019 at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. United States Trustee's Omnibus Objection to Debtors' First Day Motions [Dkt. 173].
- B. United States Trustee's Supplemental Objection to Motion of the Debtors to Continue Their Existing Cash Management System and for Other Relief [Dkt. 606].
 - i. Declaration of Michael Sorgaard in Support of United States Trustee's Objection [Dkt. 608].
- C. Statement and Reservation of Rights of Official Committee of Unsecured Creditors with respect to Certain Matters Scheduled for February 27 Hearing [Dkt. 610].

Related Documents:

- D. Proposed Final Order on the Cash Management Motion and redline comparison against the interim order previously entered by the Court [Dkt. 491-1].
- E. Further Revised Proposed Final Order on the Cash Management Motion and redline comparison against the interim order previously entered by the Court [Dkt. 811-2].

Status: This matter is going forward.

3. **Operational Integrity Suppliers Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 503(b)(9) and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to Pay Prepetition Obligations Owed to Certain Safety and Reliability, Outage, and Nuclear Facility Suppliers [Dkt. 12].

Response Deadline: February 20, 2019, except for the Official Committee of Unsecured Creditors and the Official Committee of Tort Claimants, for whom the

response deadline was extended by stipulation and order to March 8, 2019 at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Wilson Utility Construction Company's Response in Support of Motion of Debtors Pursuant to 11 U.S.C. §§ 150(A), 363(B), 503(B)(9) and F.R.B.P. 6003 and 6004 for Interim and Final Authority to Pay Prepetition Obligations Owed to Certain Safety and Reliability, Outage, and Nuclear Facility Suppliers (ECF No. 12); and the Motion of the Debtors Pursuant to 11 U.S.C. §§ 150(A), 363(B), 503(B)(9) and F.R.B.P. 6003 and 6004 (I) For Interim and Final Authority to Pay Prepetition Obligations Owed to Shippers, Warehousemen, and Other Lien Claimants, and (II) Granting Administrative Expense Priority Status for Claims Arising from Goods Delivered to Debtors' Postpetition (ECF No. 13) [**Dkt. 496**].
- B. Objection of Creditor AA/ACME Locksmiths, Inc. to Final Order Granting Operational Integrity Supplier Motion [**Dkt. 506**].
- C. Refiled Conditional Objection of Holt of California to Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 503(b)(9) and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to Pay Prepetition Obligations Owed to Certain Safety and Reliability, Outage, and Nuclear Facility Suppliers [**Dkt. 508**].
- D. Statement and Reservation of Rights of Official Committee of Unsecured Creditors with respect to Certain Matters Scheduled for February 27 Hearing [**Dkt. 610**].
- E. Withdrawal Without Prejudice of Refiled Conditional Objection of Holt of California to Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 503(b)(9) and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to Pay Prepetition Obligations Owed to Certain Safety and Reliability, Outage, and Nuclear Facility Suppliers [**Dkt. 658**].
- F. Notice of Withdrawal of Objection to Final Order Granting Operational Integrity Supplier Motion by AA/Acme Locksmiths, Inc. [**Dkt. 686**].

Related Documents:

- G. Proposed Final Order on the Operational Integrity Suppliers Motion and redline comparison against the interim order previously entered by the Court [**Dkt. 491-4**].
- H. Debtors' Statement and Omnibus Reply in Support of First Day and Other Motions set for Hearing on February 27, 2019 [**Dkt. 652**].
- I. Declaration of John Boken in Further Support of First Day Motions and Related Relief [**Dkt. 653**].
- J. Second Interim Order on the Operational Integrity Suppliers Motion [**Dkt. 741**].

K. Further Revised Proposed Final Order on the Operational Integrity Suppliers Motion and redline comparison against the second interim order previously entered by the Court [**Dkt. 811-3**].

Status: This matter is going forward.

4. **Public Entities Committee Motion.** Motion of Public Entities for Appointment of Official Committee of Public Entities Pursuant to 11 U.S.C. §§ 1102(a)(2) and 105(a) [**Dkt. 720**]

Response Deadline: March 11, 2019 at 12:00 p.m. (Pacific Time).

Responses Filed:

- A. United States Trustee's Objection to Motion of Public Entities for Appointment of Official Committee of Public Entities under 11 U.S.C. §§ 1102(a)(2) and 105 [**Dkt. 803**].
- B. Opposition of the Official Committee of Unsecured Creditors to Motion of Public Entities for Appointment of Official Committee of Public Entities Pursuant to 11 U.S.C. §§ 1102(a)(2) and 105(a) [**Dkt. 819**].
- C. Objection by Debtors to Public Entities' Motion for Appointment of Official Committee of Public Entities Pursuant to 11 U.S.C. §§ 1102(a)(2) and 105(a) [**Dkt. 820**].
- D. Joinder of the Ad Hoc Committee of Unsecured Noteholders to Opposition of the Official Committee of Unsecured Creditors to Motion of Public Entities for Appointment of Official Committee of Public Entities Pursuant to 11 U.S.C. §§ 1102(a)(2) and 105(a) [**Dkt. 823**].

Related Documents:

- E. *Ex Parte* Motion to Shorten Time for Notice and Hearing on Motion of Public Entities for Appointment of Official Committee of Public Entities Pursuant to 11 U.S.C. §§ 1102(a)(2) and 105(a) [**Dkt. 715**].
- F. Declaration of Sander L. Esserman in Support of *Ex Parte* Motion to Shorten Time for Notice and Hearing on Motion of Public Entities for Appointment of Official Committee of Public Entities Pursuant to 11 U.S.C. §§ 1102(a)(2) and 105(a) [**Dkt. 716**].
- G. Order Shortening Time for Hearing on Motion of Public Entities for Appointment of Official Committee of Public Entities Pursuant to 11 U.S.C. §§ 1102(a)(2) and 105(a) [**Dkt. 719**].
- H. Declaration of Sander L. Esserman in Support of Motion to Shorten Time for Notice and Hearing on Motion of Public Entities for Appointment of Official Committee of Public Entities Pursuant to 11 U.S.C. §§ 1102(a)(2) and 105(a) [**Dkt. 721**].
- I. Notice of Hearing on Motion of Public Entities for Appointment of Official Committee of Public Entities Pursuant to 11 U.S.C. §§ 1102(a)(2) and 105(a) [**Dkt. 722**].

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Status: This matter is going forward.

PLEASE TAKE NOTICE that copies of any papers filed with the court and referenced herein can be viewed and/or obtained: (i) by accessing the Court's website at <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

Dated: March 12, 2019

WEIL, GOTSHAL & MANGES LLP

KELLER & BENVENUTTI LLP

By: /s/ Jane Kim

Jane Kim

*Proposed Attorneys for Debtors and
Debtors in Possession*